THE OFFICE OF REGULATORY STAFF DIRECT TESTIMONY AND EXHIBITS

OF

MATTHEW P. SCHELLINGER II

June 18, 2014



DOCKET NO. 2014-4-G

ANNUAL REVIEW OF PURCHASED GAS ADJUSTMENT AND GAS PURCHASING POLICIES OF PIEDMONT NATURAL GAS COMPANY, INC.

June 18, 2014 Page 1 of 9 1 DIRECT TESTIMONY OF MATTHEW P. SCHELLINGER II 2 **FOR** 3 THE OFFICE OF REGULATORY STAFF 4 **DOCKET NO. 2014-4-G** 5 IN RE: ANNUAL REVIEW OF PURCHASED GAS ADJUSTMENT ("PGA") AND GAS PURCHASING POLICIES OF PIEDMONT NATURAL GAS 6 7 COMPANY, INC. 8 9 Q. PLEASE STATE YOUR NAME, BUSINESS ADDRESS AND OCCUPATION. 10 A. My name is Matthew P. Schellinger II. My business address is 1401 Main Street. 11 Suite 900, Columbia, South Carolina, 29201. I am employed by the Office of Regulatory 12 Staff ("ORS") in the Audit Department as an Auditor. PLEASE STATE YOUR EDUCATIONAL BACKGROUND AND EXPERIENCE. 13 Q. 14 A. I received a Bachelor of Science Degree with a major in Accounting from 15 University of South Florida in 2012. From 2007 to 2013, I was employed as a controller 16 for an insurance agency. In that capacity, I performed general corporate accounting 17 functions on a daily and monthly basis. In February 2013, I began my employment with 18 ORS and since then have participated in cases dealing with the regulation of nuclear 19 waste, gas, electric, water and wastewater. This is my first time testifying before this 20 commission. 21 Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY INVOLVING PIEDMONT 22 **NATURAL GAS COMPANY, INC.?**

June 18, 2014 Page 2 of 9 1 The purpose of my testimony is to set forth findings resulting from ORS's A. 2 examination of Piedmont Natural Gas Company, Inc.'s ("Company" or "Piedmont") 3 deferred account #253.04, inventory calculations, and account #191.01 - deferred account 4 hedging program, for the period of April 2013 through March 2014 ("review period"). 5 Q. IN CONNECTION WITH YOUR TESTIMONY, DID YOU PREPARE OR 6 CAUSE TO BE PREPARED ANY EXHIBITS? 7 A. Yes, the Audit Department prepared Audit Exhibit MPS-1, titled "Account 8 #253.04 Analysis Summary;" Audit Exhibit MPS-2, titled "Storage Inventory Activity;" and Audit Exhibit MPS-3, titled "Risk Management - Hedging Program (Gain)/Loss 9 10 Recognized and Other Expenses," in connection with this testimony. These exhibits were 11 prepared by me or under my direction and supervision. 12 0. UNDER WHAT AUTHORITY DOES ORS MONITOR THE ACTIVITY IN 13 PIEDMONT'S DEFERRED ACCOUNT #253.04? 14 In Docket Nos. 83-126-G and 86-217-G, Order No. 88-294, the Public Service A. 15 Commission of South Carolina ("Commission") found that: 16 (1) A true-up for differences between billed and filed rates is appropriate and 17 necessary to ensure that Piedmont's customers pay no more than Piedmont's 18 actual cost of gas. 19 (2) A true-up of demand charges for changes in sales volumes is appropriate and 20 necessary to ensure that Piedmont's customers pay no more than 21 actual cost of gas. 22 (3) The Company is to maintain an account reflecting its gas costs each month, the amount of gas costs recovered each month, and amounts deferred from 23 month

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June 18, 2014 Page 3 of 9 1 to month. The Company is also required to file, with the Commission, a report on 2 a monthly basis showing the status of this deferred account. 3 Additionally, with the issuance of Order No. 2002-223 dated March 26, 2002 in 4 Docket No. 2001-410-G, the Company is required to file regular reports on the status of 5 the hedging program and the results of its hedging activities. 6 HAS ORS EXAMINED THE COMPANY'S DEFERRED ACCOUNT? Q. 7 A. Yes. ORS has examined the activities included in deferred account #253.04. In 8 addition, ORS has examined the Company's gas storage inventory accounts and account 9 #191.01 - deferred account hedging program, for the review period. 10 0. PLEASE EXPLAIN AUDIT EXHIBIT MPS-1. 11 Audit Exhibit MPS-1 presents, for each month of the review period under A. 12 examination, the components which comprise the Company's (over)/under collection in 13 deferred account #253.04. These components are: 14 Commodity True-Up - These amounts represent the difference in the Company's actual 15 gas costs on a monthly basis as compared to the benchmark cost of gas included in the Company's Gas Cost Recovery Mechanism ("GCRM") filings during the review period. 16 17 The Company's benchmark cost of gas at the beginning of the review period was \$3.00 18 per dekatherm, established as a result of the Company filing GCRM #135, effective the 19 first billing cycle in February 2013. The Company's benchmark cost of gas at the end of 20 the review period was \$4.00 per dekatherm, established as a result of the Company filing 21 GCRM #138, effective the first billing cycle in February 2014. In accordance with Order 22 No. 2010-250 dated March 30, 2010, the Company includes unbilled volumes in its

commodity true-up calculations in order to achieve a better matching of gas cost

Direct Testimony of Matthew P. Schellinger II Docket No. 2014-4-G Piedmont Natural Gas Co., Inc. June 18, 2014 Page 4 of 9 1 collections versus actual gas costs in the months they occur. South Carolina's portion of 2 commodity true-up for the review period decreased the over collection by \$2,502,302. 3 **Demand True-Up** - These amounts represent the (over)/under collection of demand charges incurred by the Company as compared to demand charges billed and collected 4 5 from customers. In accordance with Order No. 2010-250 dated March 30, 2010, the 6 Company includes unbilled volumes in its demand true-up calculations in order to 7 achieve a better matching of gas cost collections versus actual gas costs in the months 8 they occur. The design day factor for allocation of demand charges to South Carolina 9 changed from 16.01% to 14.92%, effective January 1, 2014, due to North Carolina 10 Utilities Commission Docket No. G-9 Sub 631, Order dated December 17, 2013. The 11 methodology used to calculate the design day factor for demand allocation of 14.92% is 12 in compliance with Commission Docket No. 2003-251-G, Order No. 2004-501, dated 13 October 15, 2004. Demand true-up for the review period increased the over collection by 14 \$1,066,364. 15 Negotiated Losses - In competition with alternate fuels, the Company's GCRM allows it 16 to maintain its industrial load by selling gas at less than the approved tariff, resulting in 17 margin losses. Negotiated losses for the review period decreased the over collection by 18 \$1,052,024. 19 Secondary Market Sharing - Effective with rates approved in Docket No. 2002-63-G. 20 Order No. 2002-761 dated November 1, 2002, the Company credits 75% of the margin 21 from off-system sales and capacity release transactions to deferred account #253.04. The

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remaining 25% is retained by the Company. Additionally, the Order provided that

capacity release credits and off-system sales would be allocated to South Carolina using

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by \$314,307.

June 18, 2014 Page 5 of 9 1 the same design day methodology approved for fixed demand costs. Shared margins and 2 capacity release credits for the review period increased the over collection by \$10,570,490. It should be noted that in compliance with Order No. 95-1461 dated 3 August 22, 1995, issued in Docket No. 95-160-G, the Company is properly reporting 4 5 capacity release activity. These capacity release credits totaling \$2,765,402 are included 6 in the total of \$10,570,490 listed above for secondary market sharing. Weather Normalization - In compliance with Order No. 95-1649 dated November 7. 8 1995, issued in Docket No. 95-715-G, the Company began recording in deferred account 9 #253.04 weather normalization effective for the winter heating season of November 10 through March. The weather normalization adjustment is designed to increase or 11 decrease the margin component of the rate based on a comparison of actual weather 12 conditions during the period, to normal weather conditions. Weather normalization 13 adjustments for the review period increased the over collection by \$2,258,105 as a result 14 of colder than normal weather for the 2013-2014 heating season. 15 <u>Uncollectible</u> - In Docket No. 2006-4-G, Order No. 2006-527 dated October 11, 2006. 16 the Commission approved the Company's request to remove uncollectible gas cost expense from its cost of service and authorized the recovery of these costs through the 17 18 Company's gas cost deferred account #253.04. Under this revised methodology, the 19 commodity cost of gas portion of uncollectible accounts is now a component of deferred 20 account #253.04. The balance of the uncollectible accounts expensed, including the 21 Company's margin, will be recovered through their Rate Stabilization Act filing. The

uncollectible gas cost adjustment decreased the over collection during the review period

June 18, 2014 Page 6 of 9 1 Supplier Refunds - The Company received supplier refunds totaling \$11,709,448 during 2 the review period. South Carolina's allocation of these refunds resulted in an increase to 3 the over collection of \$1,749,053. 4 Hedging Activity Transfer - In Docket No. 2006-4-G, Order No. 2006-527 dated 5 October 11, 2006, the Commission authorized the Company to transfer the balance of its 6 cumulative hedging gains or losses to deferred account #253.04 on a monthly basis, 7 effective November 1, 2006. Transfer of the monthly hedging gains and losses to 8 deferred account #253.04 for the review period resulted in an increase to the over 9 collection of \$776,800. 10 Interest - In Docket No. 2009-4-G, Order No. 2009-579 the Commission ordered that. 11 effective September 1, 2009, the interest rate to calculate (over)/under collection balances 12 to be the rate of interest as of the first day of each month for 10-year United States 13 Government Treasury Bills, plus an all-in spread of 65 basis points (.65 percentage 14 points). It also ordered that interest not be accrued on (over)/under collection balances 15 which exceed \$20 million in the deferred account. Total accrued interest for the review 16 period resulted in a decrease to the over collection of \$107,766. 17 Q. WHAT IS INCLUDED IN AUDIT EXHIBIT MPS-2, STORAGE INVENTORY 18 **ACTIVITY?** 19 A. During our examination, the Company provided ORS with detailed inventory calculations of its underground and liquefied natural gas ("LNG") storage facilities. ORS 20 21 accumulated the various inventory levels by storage location in total, and included a 22 summary of them in Audit Exhibit MPS-2, for Commission consideration.

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The Company has contracted with six (6) underground storage facilities. Four (4) of these facilities are on the Transco System. They include General Storage Service and General Storage Service - Dominion located in Pennsylvania, Washington Storage Service located in Louisiana, and Eminence Storage Service located in Mississippi. The fifth and sixth underground storage facilities are on the Columbia Gas Transmission The fifth is Firm Storage Service, which is owned by Columbia Gas System. Transmission Corporation and operated by Columbia Gas Storage, with facilities in Pennsylvania, Virginia, and West Virginia. The sixth is Hardy Storage Company, located in West Virginia, which is jointly owned by Columbia Gas Transmission Corporation and Piedmont. Audit Exhibit MPS-2, "Total Underground" section, details the inventory activities of these underground facilities in total. The inventory located in the six (6) underground facilities at the beginning of the review period totaled 6,060,321 dekatherms at a total cost of \$23,439,156 or a weighted average cost of \$3.8676 per dekatherm. The net inventory increased during the review period resulting in an ending inventory balance in the underground facilities of 6,915,417 dekatherms at a total cost of \$28,638,773 or a weighted average cost per dekatherm of \$4.1413. During its examination, ORS obtained verification from the storage facility operators of the volumes stored in each of these facilities at the close of the review period.

Audit Exhibit MPS-2 also contains a section titled "Total LNG" which is a summary of the various LNG inventories maintained by the Company, including Pine Needle. Pine Needle is an LNG facility located in Guilford County, North Carolina and is jointly owned by Piedmont, Transco and several other utilities and/or investors. Inventory is also stored at the Company's LNG facilities located at LNG-Huntersville

June 18, 2014 Page 8 of 9 1 near Charlotte, North Carolina and at LNG-Bentonville in Four Oaks, North Carolina. 2 Piedmont also has inventory at the Transco LNG facility located in Carlstadt, New Jersey. Piedmont's records indicated LNG inventory located in these facilities at the 3 beginning of the review period totaled 1,817,542 dekatherms at a total cost of 4 5 \$8,855,585, or a weighted average cost of \$4.8723 per dekatherm. The net inventory 6 decreased during the review period resulting in an ending LNG inventory balance for 7 these three facilities of 1,431,336 dekatherms at a total cost of \$7,059,101 or a weighted 8 average cost per dekatherm of \$4.9318. During its examination, ORS verified the 9 calculation of ending inventory balances and the injections and withdrawals to the daily 10 storage activity worksheets for each facility. 11 Q. WHAT IS INCLUDED ON AUDIT EXHIBIT MPS-3, RISK MANAGEMENT-12 **HEDGING PROGRAM?** 13 **A**. Audit Exhibit MPS-3 details the results of the Company's hedging program for 14 the review period. Order No. 2002-223 dated March 26, 2002 approved the Company's 15 experimental natural gas hedging program. 16 In Docket No. 2006-4-G, Order No. 2006-527, effective November 1, 2006, the 17 Commission authorized the Company to transfer the balance of its cumulative hedging gains or losses to account #253.04 on a monthly basis. Monthly net hedging gains or 18 19 losses before interest were transferred to deferred account #253.04 and included as part of 20 the interest calculation. Total hedging activity for the review period resulted in an 21 increase in the over collection in account #253.04 of \$776,800. 22 As indicated on Audit Exhibit MPS-3, the cumulative loss at the end of the review

period for the hedging program is \$38,568,547.

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1 Q. WHAT ARE ORS'S FINDINGS REGARDING PIEDMONT'S DEFERRED

2 **ACCOUNT #253.04?**

- 3 A. Based on our examination, it is the opinion of ORS that the over collection
- balance in deferred account #253.04 at March 31, 2014 of \$9,670,461, shown on
- 5 Company witness Thornton's Exhibit__(RLT-1), is accurately stated.
- 6 Q. DOES THIS CONCLUDE YOUR TESTIMONY?
- 7 **A**. Yes.

PIEDMONT NATURAL GAS COMPANY, INC. ACCOUNT #253.04 ANALYSIS SUMMARY FOR TWELVE MONTHS ENDED MARCH 31, 2014

•					2013	,					2014		
Month	April	Мау	June	July	August	September	October	November	December	January	February	March	Total
	∽	6 9	69	∽	69	ø,	ø	s	S	⇔	∽	s,	ss.
Beginning Balance	2,773,949	4,255,754	4,145,722	5,383,543	6,630,151	7,902,440	8,893,609	9,635,910	7,111,471	3,514,170	(5,954,112)	(7,302,577)	
Commodity True-Up	903,521	(1,128,043)	(168,796)	(205,760)	(244,254)	(305,430)	(358,993)	(1,334,053)	(954,142)	888,650	3,646,983	1,762,619	2,502,302
Demand True-Up	683,398	1,157,681	1,433,457	1,451,755	1,429,515	1,356,144	1,111,788	(944,674)	(1,500,322)	(4,114,515)	(1,738,116)	(1,392,475)	(1,066,364)
Negotiated Losses	38,352	47,164	55,443	57,177	56,788	59,420	59,468	147,622	160,581	143,249	99,852	126,908	1,052,024
Secondary Market Sharing	(180,634)	(212,865)	(207,807)	(218,146)	(212,106)	(223,147)	(255,486)	(333,951)	(633,680)	(5,373,667)	(1,805,059)	(913,942)	(10,570,490)
Weather Normalization	3,661	341	24	33	133	(53)	80	(117,091)	(481,290)	(411,711)	(1,085,183)	(166,977)	(2,258,105)
Uncollectibles	25,901	48,980	62,834	32,535	64,224	33,842	24,184	5,447	83	(435)	5,168	11,544	314,307
Supplier Refunds	0	0	(581)	0	(28,837)	0	0	0	0	0	0	(1,719,635)	(1,749,053)
Hedging Activity Transfer	802	(33,115)	50,796	112,797	186,267	47,581	136,720	28,569	(204,799)	(596,482)	(453,852)	(52,087)	(776,800)
Other Adjustments	0	0	0	0	0	0	0	0	0	0	0	0	0
Ending Balance Before Interest	4,248,953	4,135,897	5,371,092	6,613,934	7,881,881	8,870,797	9,611,298	7,087,779	3,497,902	(5,950,741)	(7,284,319)	(9,646,622)	
Interest	6,801	9,825	12,451	16,217	20,559	22,812	24,612	23,692	16,268	(3,371)	(18,258)	(23,842)	107,766
Ending Balance	4,255,754	4,145,722	5,383,543	6,630,151	7,902,440	8,893,609	9,635,910	7,111,471	3,514,170	(5,954,112)	(7,302,577)	(9,670,464)	
Interest Rate	2.324%	2.810%	3.140%	3.244%	3.400%	3.264%	3.192%	3.400%	3.680%	3.320%	3.310%	3.376%	

(1) - Variance from Exhibit (RLT-1) of \$3 due to rounding

(\$9,670,464) (1)

Deferred Account #253.04 (Over)/Under-Collection as of 3/31/14

PIEDMONT NATURAL GAS COMPANY, INC. STORAGE INVENTORY ACTIVITY FOR TWELVE MONTHS ENDED MARCH 31, 2014

		Ĺ	Total Underground Injections	ground			Total Underground	pun		e ^{re}	Fotal Underground Balance	
•	Gross DTs	Used/Injected	Price	Commodity	Injection/Charge	W/D Charge	DTs	Price	Amount	DTs	Amount	Wtd. Cost
•	#	#	S	s	S	S	#	S	<u>ب</u>	#	ss	s
g. Bal.										6,060,321	23,439,156	3.8676
pr-13	2,983,931	(71.131)	4.0584	12,109,996	116,429	0	(113,894)	3.9063	(444,907)	8,859,227	35,220,674	3.9756
[av-13	3,311,961	(91,097)	4.1394	13,709,385	155,212	0	(46,824)	4.0429	(189,305)	12,033,267	48,895,966	4.0634
un-13	2,284,460	(71,015)	4,1075	9,383,382	125,042	0	(35,984)	4.0474	(145,642)	14,210,728	58,258,748	4.0996
'ul-13	2,257,447	(72,395)	3.6963	8,344,089	121,207	0	(501,403)	4.0391	(2,025,232)	15,894,377	64,698,812	4.0705
ne-13	1.068.716	(40,757)	3.4760	3,714,899	20,606	0	(359,499)	4.0276	(1,447,936)	16,562,837	67,016,381	4.0462
ep 13	1,181,840	(33,467)	3.5195	4,159,487	51,655	0	(258,302)	4.0017	(1,033,637)	17,452,908	70,193,886	4.0219
ct-13	894.350	(22,164)	3.4486	3.084.274	52,431	0	(433,002)	4.0037	(1,733,619)	17,892,092	71,596,972	4.0016
lov-13	715,501	(13,654)	3.5732	2,556,645	25,438	0	(1,537,750)	3.9805	(6,121,005)	17,056,189	68,058,050	3.9902
ec-13	689,158	(15,445)	3.9879	2,748,295	26,600	0	(1,913,545)	3.9764	(7,609,011)	15,816,357	63,223,934	3.9974
an-14	220,847	(6.238)	4.6070	1.017.432	10,576	0	(4,772,740)	4.0179	(19,176,618)	11,258,226	45,075,324	4.0038
eb-14	307,232	(7.124)	5.5444	1,703,403	11,308	0	(3,477,666)	4.0590	(14,115,740)	8,080,668	32,674,295	4.0435
Mar-14	1,295,581	(16,473)	4.7675	6,176,636	28,957	0	(2,444,359)	4.1897	(10,241,115)	6,915,417	28,638,773	4.1413
•	17.211.024	(460,960)	3.9921	68,707,923	775,461	0	(15,894,968)	4.0443	(64,283,767)			

	Wtd. Cost	49	4.8723	4.8351	4.7743	4.7310	4.6362	4.5247	4.4537	4.4708	4.4856	4.5054	4.6501	4.7360	4.9318	
Total LNG Balance	Amount	S	8,855,585	9,854,484	11,548,169	13,175,030	14,680,890	15,965,765	17,758,702	18,190,781	17,519,884	16,776,208	12,338,618	10,229,102	7,059,101	
	DTs	#	1,817,542	2,038,121	2,418,805	2,784,809	3,166,557	3,528,617	3,987,371	4,068,814	3,905,845	3,723,610	2,653,422	2,159,853	1,431,336	
nts evel	Amount	s		0	0	0	0	0	0	0	0	0	0	0	0	C
Adjustments To Tank Level	DTs	#		0	0	0	0	0	0	0	0	0	0	0	0	c
	Amount	s		(713,282)	(138,486)	(146,518)	(134,086)	(235,172)	(73,827)	(179,253)	(798,500)	(1,322,551)	(5,633,083)	(2,677,558)	(4,868,566)	(16 920 882)
	Price	5 9		4.3482	5.0202	5.0357	5.0557	5.0892	5.1166	4.9908	4.2180	4.2393	4.3644	4.5305	4.5863	4 4666
Total LNG Withdrawals	DTs	#		(164,041)	(27,586)	(29,096)	(26,522)	(46,210)	(14,429)	(35,917)	(189,309)	(311,975)	(1,290,680)	(591,002)	(1,061,546)	(2 799 213)
	W/D Chg/Exp Def	~		57,030	26,159	25,625	26,960	27,166	108,093	195,075	30,352	12,619	56,478	37,063	19,203	60163
	Injection/Charge	~		12,947	13,014	12,594	13,014	13,014	10,075	0	840	2,323	113,303	1,446	25,213	207 710
	Commodity	S		1.642.204	1,792,998	1,735,160	1.599.972	1.479.867	1.748.596	416.257	96,411	563,933	1.025,712	529.533	1,654,149	14 204 702
Total LNG Injections	Price	S		4.0000	4.1800	4.1800	3.7300	3.4500	3.5745	3.5468	3.5000	4.2333	4.4517	5.3191	4.7538	10161
	Used/Injected	#		(25.931)	(20,677)	(20.010)	(20,677)	(20.677)	(16.008)	0	(1,206)	(3.472)	(9.918)	(2.121)	(14.934)	10000
	Gross DTs	1		410.551	428 947	415.110	428 947	428 947	489 191	117 360	27.546	133,212	230,410	99 554	347.963	
	•	•	Beg. Bal.	Anr-13	Mav-13	Inn-13	[m-13	Aug-13	Sep-13	Oct-13	Nov-13	Dec-13	Ian-14	Feb. 14	Mar-14	

PIEDMONT NATURAL GAS COMPANY, INC.
RISK MANAGEMENT - HEDGING PROGRAM
(GAIN)/LOSS RECOGNIZED AND OTHER EXPENSES
FOR TWELVE MONTHS ENDED MARCH 31, 2014

Month	(Gain) or Loss	Trading Fees	(Gain) or Loss Recognized	Interest	RMI Fee	Real-Time Pricing Fee	Net (Gain) or Loss	Cumulative (Gain) or Loss
	€9	⇔) 69	\$	S	€5	€	69
Beginning Balance								39,345,347
Apr-13	0	0	0	0	791	14	805	39,346,152
May-13	(33,920)	0	(33,920)	0	790	14	(33,116)	39,313,036
Jun-13	50,270	512	50,782	0	0	15	50,797	39,363,833
Jul-13	110,830	1,162	111,992	0	791	14	112,797	39,476,630
Aug-13	183,540	1,922	185,462	0	790	14	186,266	39,662,896
Sep-13	46,280	496	46,776	0	791	15	47,582	39,710,478
Oct-13	134,474	1,442	135,916	0	790	14	136,720	39,847,198
Nov-13	27,470	294	27,764	0	790	14	28,568	39,875,766
Dec-13	(207,030)	635	(206,395)	0	1,581	15	(204,799)	39,670,967
Jan-14	(597,460)	961	(596,499)	0	0	17	(596,482)	39,074,485
Feb-14	(455,420)	908	(454,614)	0	746	16	(453,852)	38,620,633
Mar-14	(53,080)	233	(52,847)	0	746	15	(52,086)	38,568,547
	(794,046)	8,463	(785,583)	0	8,606	177	(776,800)	